

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Clearview AI, Inc. Consumer Privacy
Litigation

Civil Action File No.: 1:21-cv-00135
Judge Sharon Johnson Coleman
Magistrate Judge Maria Valdez

**PLAINTIFFS' NOTICE OF CLARIFICATION OF
RELIEF SOUGHT IN CONNECTION WITH PLAINTIFFS' REQUEST FOR A
TEMPORARY RESTRAINING ORDER**

Plaintiffs, by appointed interim lead class counsel, respectfully submit this Notice of Clarification of Relief Sought in Connection with Plaintiffs' Request for a Temporary Restraining Order and state as follows:

In the “Wherefore” clause of Plaintiffs’ Emergency Motion to Convert Their Pending Motion for Preliminary Injunction Into a Motion for a Temporary Restraining Order and Preliminary Injunction (the “Emergency Motion”) (Dkt. 69), Plaintiffs define the relief sought as follows: “(a) convert Plaintiffs’ pending motion for preliminary injunction into a motion for a temporary restraining order and preliminary injunction; and (b) ***temporarily restrain Defendants from distributing and disseminating Plaintiffs’ and Illinois residents’ Biometric Data.***” *Id.* at ECF 5. Although Plaintiffs’ counsel does not have a copy of the transcript of the May 21, 2021 hearing, Plaintiffs’ counsel believes he may have inaccurately described the relief sought as an order solely restraining the distribution and dissemination of the Biometric Data to the offshore companies described in the Emergency Motion. Out of an abundance of caution, Plaintiffs wish to clarify that they seek to temporarily restrain Defendants from distributing and disseminating

Plaintiffs' and Illinois residents' Biometric Data during the pendency of the preliminary injunction motion. This requested relief is consistent with the stated goal of maintaining the status quo while the Court considers Plaintiffs' Motion for Preliminary Injunction. *See* Dkt. 69 at ¶ 11 ("Converting the preliminary injunction into a motion for a temporary restraining order and preliminary injunction will allow the Court to preserve the status quo pending resolution of the preliminary injunction.").

Dated: May 23, 2021

Respectfully submitted,

By: /s/ Scott R. Drury
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Interim Lead Class Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

I, Scott R. Drury, an attorney, hereby certify that, on May 23, 2021, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Scott R. Drury

Interim Lead Class Counsel for Plaintiffs
